

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SEA TRADE MARITIME CORPORATION and
GEORGE PETERS,

Plaintiffs,

v.

STELIOS COUTSODONTIS, FRANCESCA
ELENI COUTSODONTIS, GENERAL
MARITIME ENTERPRISES CORPORATION,
ATTIKA INTERNATIONAL NAVIGATION SA,
IASON SHIPPING LTD., PINTO SHIPPING
LTD. and KARTERIA SHIPPING LTD.,

Defendants.

Civil Action No.: 09 CIV 00488 (BSJ)

**DECLARATION OF PETER A.
HALPRIN IN SUPPORT OF
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

Peter A. Halprin, states as follows:

1. I am an attorney admitted to practice before the courts of the State of New York and before the United States District Court for the Southern District of New York. I am an associate with the firm of Anderson Kill & Olick, P.C. ("AKO"), attorneys for Plaintiffs Sea Trade Maritime Corporation and George Peters ("Plaintiffs") in the above-referenced matter. The purpose of this Declaration is to place before the Court documents to which Plaintiffs' refer in their Memorandum of Law In Support of Plaintiffs' Motion for Summary Judgment.
2. Attached hereto as Exhibit A is a true and correct copy of the Articles of Incorporation of Sea Trade Maritime Corporation, dated July 8, 1992.
3. Attached hereto as Exhibit B is a true and correct copy of Sea Trade Maritime Corporation's Stock Certificate, dated February 12, 1997.

4. Attached hereto as Exhibit C is a true and correct copy of the Order of the Hon. J. Herman Cahn of the Supreme Court of New York, dated February 1, 2006, filed in the action captioned Coutsodontis v. Peters, Civil Action No. 600511/05.

5. Attached hereto as Exhibit D is a true and correct copy of the Liberian Opinion of Mr. G. Constantatos, dated April 16, 2008, regarding Liberian law.

6. Attached hereto as Exhibit E is a true and correct copy of the Legal Opinion of Potter Anderson & Corroon LLP, dated July 16, 2009, regarding Delaware law.

7. Attached hereto as Exhibit F is a true and correct copy of the Decision in Issues 312/2008, dated August 4, 2008, of Section 2 of the Commercial Court 1 Tarragona, Tarragona, Spain; and a true and correct copy of the Appellate Decision in the Appeal of Decision in Issues 312/2008, dated February 19, 2009, of Section 2 of the Commercial Court 1 Tarragona, Tarragona, Spain.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts contained in the foregoing are true and correct.

Dated: February 16, 2011
New York, New York

By: /s/ Peter A. Halprin
Peter A. Halprin, Esq.

Anderson Kill & Olick, P.C.
1251 Avenue of the Americas
New York, NY 10020
Telephone: 212-278-1000

Attorneys for Plaintiffs
Sea Trade Maritime Corporation
and George Peters